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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

STMICROELECTRONICS, INC., Plaintiff and Counterdefendant, vs. ELIYAHOU HARARI; SANDISK CORPORATION; and DOES 1-20, Defendants and Counterclaimants.) No. C 05-4691 JF RS (filed Nov. 16, 2005))))) STIPULATION AND [PROPOSED]) ORDER REGARDING) STMICROELECTRONICS, INC.'S) MOTION PURSUANT TO FED. R. CIV. P.) 56(F)))
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Pursuant to Civil L.R. 6-2 and 7-12, Plaintiff and Counterdefendant STMicroelectronics, Inc. (“ST”) and Defendants and Counterclaimants SanDisk Corporation (“SanDisk”) and Eliyahou Harari (“Harari”) jointly submit this stipulation to request the court to enter a briefing schedule on ST’s Motion pursuant to Fed. R. Civ. P. 56(f), currently set for hearing on June 9, 2006. The parties request that the Court allow them to depart from deadlines set forth in Civil L.R. 7-3 so that ST’s Motion can be heard prior to or concurrently with Defendants’ Motion for Summary Judgment. The parties hereby agree to the following schedule:

May 19, 2006 – ST files its Motion pursuant to Fed. R. Civ. P. 56(f);

May 26, 2006 – Defendants’ file their Opposition to ST’s Motion;

June 2, 2006 – ST files its Reply Brief in Support of its Motion;

June 9, 2006 – Hearing on ST’s Rule 56(f) Motion.

Nothing in this Stipulation alters or modifies the existing briefing and hearing schedule on Defendants’ pending Motion for Summary Judgment.

Dated: May 18, 2006

SIDLEY AUSTIN LLP

By: /s/ Matthew L. McCarthy
Matthew L. McCarthy

*Attorneys for Plaintiff and Counterdefendant
STMicroelectronics, Inc.*

Dated: May 18, 2006

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

By: /s/ Bart Volkmer
Bart Volkmer

*Attorneys for Defendants and Counterclaimants
SanDisk Corporation and Eliyahou Harari*

ECF CERTIFICATION

I, Matthew L. McCarthy, am the ECF User whose identification and password are being used to file this Joint Stipulation & Proposed Order. In compliance with General Order 45.X.B, I hereby attest that Bart Volkmer has concurred in this filing.

Dated: May 18, 2006

SIDLEY AUSTIN LLP

By: /s/ Matthew L. McCarthy
Matthew L. McCarthy

*Attorneys for Plaintiff and Counterdefendant
STMicroelectronics, Inc.*

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED. The briefing schedule set forth above is hereby approved by the Court.

Dated: 5/19/06


The Honorable Jeremy Fogel